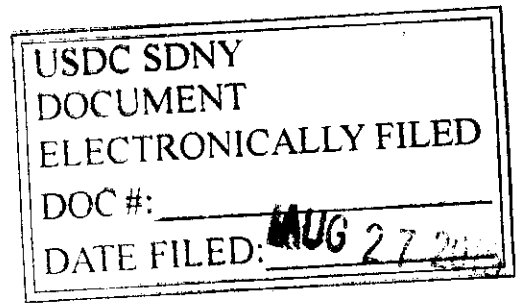


JUDGE GARDEPHE

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK



- - - - - x

UNITED STATES OF AMERICA :

- v. - :

DOUGLAS MCLARTY,  
a/k/a "Q Don," and  
BRIAN RICHARDS,  
a/k/a "B Rich,"

INDICTMENT

15 CRIM 593

Defendants.

- - - - - x

COUNT ONE

The Grand Jury charges:

1. On or about June 20, 2014, in the Southern District of New York, DOUGLAS MCLARTY, a/k/a "Q Don," and BRIAN RICHARDS, a/k/a "B Rich," the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, to violate Title 18, United States Code, Section 922(g)(1).

2. It was a part and an object of the conspiracy that DOUGLAS MCLARTY, a/k/a "Q Don," the defendant, having been previously convicted in a court of a crime punishable by imprisonment for a term exceeding one year, to wit, Attempted Murder in the Second Degree in violation of New York Penal Law Sections 110 and 125.25, would and did possess a firearm, to wit, a black .45 caliber pistol

manufactured by Hi-Point, model JHP, which previously had been shipped and transported in interstate commerce (the "Hi-Point Pistol").

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York:

a. On or about June 20, 2014, DOUGLAS MCLARTY, a/k/a "Q Don," handed the Hi-Point Pistol to BRIAN RICHARDS, a/k/a "B Rich," in the vicinity of East 216th Street and White Plains Road in the Bronx, New York.

(Title 18, United States Code, Section 371.)

COUNT TWO

The Grand Jury further charges:

4. On or about June 20, 2014, in the Southern District of New York, DOUGLAS MCLARTY, a/k/a "Q Don," and BRIAN RICHARDS, a/k/a "B Rich," the defendants, knowingly possessed a firearm that moved in and affected interstate commerce, to wit, the Hi-Point Pistol, at places that MCLARTY and RICHARDS knew and had reasonable cause to believe were "school zones" within the meaning of Title 18, United States Code, Section 921(a)(25)(B), namely, at places within 1,000 feet of a private kindergarten and elementary school located at 719

East 216th Street, Bronx, New York, and within 1,000 feet of a public middle school located at 3710 Barnes Avenue, Bronx, New York.

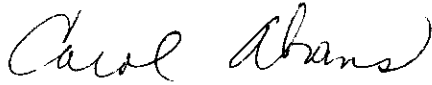
(Title 18, United States Code, Sections 922(q)(2)(A) and 2.)

COUNT THREE

The Grand Jury further charges:

5. On or about June 20, 2014, in the Southern District of New York, DOUGLAS MCLARTY, a/k/a "Q Don," the defendant, after having been previously convicted in a court of a crime punishable by imprisonment for a term exceeding one year, to wit, Attempted Murder in the Second Degree in violation of New York Penal Law Sections 110 and 125.25, knowingly did possess a firearm that moved in and affected commerce, to wit, the Hi-Point Pistol.

(Title 18, United States Code, Section 922(g)(1).)



FOREPERSON



PREET BHARARA  
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

v.

DOUGLAS MCLARTY, a/k/a "Q Don," and  
BRIAN RICHARDS, a/k/a "B Rich,"

Defendants.

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INDICTMENT

15 Cr. \_\_\_\_

(18 U.S.C. §§ 922, 371, and 2.)

PREET BHARARA

United States Attorney.

A TRUE BILL

*Carol Abams*

Foreperson.

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8/27/15 FILED INDICTMENT. ASSIGNED TO J. GARDNER

COTJUS